

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

MARTHA BOERSCH (CABN 126569)  
Chief, Criminal Division

CHRISTIAAN HIGHSMITH (CABN 296282)  
DAVID WARD (CABN 239504)  
Assistant United States Attorneys

MATTHEW CHOU (CABN 325199)  
Special Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7200  
christiaan.highsmith@usdoj.gov  
david.ward@usdoj.gov  
matthew.chou2@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 3:20-cr-00249-RS
	)	
Plaintiff,	)	<b>UNITED STATES' FIRST AMENDED</b>
	)	<b>WITNESS LIST</b>

v.

ROWLAND MARCUS ANDRADE,  
Defendant.

Trial:	Feb. 10, 2025   9:00 a.m.
Court:	Courtroom 3   17th Floor
Judge:	Hon. Richard Seeborg

The United States hereby submits its first amended list of witnesses that may be called to testify during the government's case-in-chief—and in rebuttal, to the extent the defense has timely disclosed corresponding expert testimony under Rule 16—during the trial of the above-captioned matter. The government respectfully reserves the right to amend this list and disclose additional witnesses in a manner consistent with the Federal Rules of Criminal Procedure.

The "description" column attempts to give the Court and the defendant a brief sketch of each witness's role at trial or in the charged conduct. The government respectfully requests, however, that the

Court not limit the examination of these witnesses to the precise contours of the description summarized below. Similarly, the “ID #” column is simply to help identify and count the witnesses by something other than their names. They are not currently intended to reflect the witness order.

ID #	Name	Description
1	Leslie Katz	Port of SF Commissioner/attorney
2	Michael Witte	Investor
3	Daniel Aharonoff	Investor
4	John Szeder	Andrade employee-technology
5	Brian Darling	Op-ed writer
6	Hung Tran	Andrade employee-technology
7	Evan Carlsen	Andrade employee-technology
8	Melanie Cowan	Andrade employee-office
9	A. John Bryan	Andrade employee
10	Brian Darrow	Andrade employee-salesman
11	Bernadette Tran	Andrade employee
12	Corey Jodoin	Investor & AtenCoin executive
13	Brandi Jodoin	Investor & AtenCoin executive
14	Ben Boyer	Investor
15	Rene Acuna	Investor
16	Kathryn Tunis	Superbowl Ad-NBC representative
17	Jack Abramoff	Co-Conspirator
18	Bryant Ling	Former FBI Agent
19	Chris Versace	Op-ed writer
20	Peter Roff	Op-ed writer
21	Carlos De La Guardia	Andrade associate-Panama Canal
22	Theresa Chiu	FBI Forensic Accountant ( <i>expert</i> )
23	Melissa Foteh	Andrade employee-office
24	Kieran McCavanagh	Superbowl Ad-NBC representative
25	James A. Carfora	IRS CID Special Agent ( <i>expert</i> )
26	David Salmon	Attorney
27	Scott Bruffey	Investor
28	FBI FOA Brandon Tabbal	Background on cryptocurrency ( <i>expert</i> )
29	David Hargreaves	Marketing
30	Kate Ablett	FBI Special Agent
31	Byron Rhett	Port of San Francisco
32	Victoria Hernandez	IRS records witness
33	Sean O'Malley	New York Federal Reserve Bank: Fedwire
34	Ethan Quinn	FBI Special Agent

35	Dr. Amanda Gregory	Clinical and Forensic Neuropsychologist ( <i>rebuttal expert</i> )
36	Dr. Matt Edman	Computer Scientist at NAXO Labs ( <i>rebuttal expert</i> )

DATED: January 30, 2025

Respectfully submitted,

ISMAIL J. RAMSEY  
United States Attorney

/s/  
CHRISTIAAN H. HIGHSMITH  
DAVID J. WARD  
Assistant United States Attorneys

MATTHEW CHOU  
Special Assistant United States Attorney